Syria Sanctions Overview

U.S. sanctions on Syria focus on the prohibition of the exports (and re-exports) of American goods to Syria. Items with ten percent or more U.S. content are considered U.S. goods for this purpose. Other sanctions issues of note include, but are not limited to, restrictions on dealing with Syriatel and with the Commercial Bank of Syria.

Commerce's Bureau of Industry and Security (BIS) administers export restrictions. The telecom sector is one of the few where U.S. exports to Syria may be licensed on a case-by-case basis and is broadly defined by BIS as: "Telecommunications equipment encompasses items necessary to promote the free flow of information." Commerce typically adheres to strict license review times, and has an electronic application submission process.

Treasury's Office of Foreign Assets Control (OFAC) administers financial sanctions on a number of designated individuals and entities in Syria, including Syriatel Mobile Telecom. OFAC can authorize certain transactions with designated entities, usually on a case-by-case basis via specific licenses. A sale of equipment to Syriatel would require both an OFAC and a BIS license. OFAC has a paper-based application process currently (submissions by fax or mail), and review time varies.

Some useful Syria sanctions resources:

http://damascus.usembassy.gov/sanctions-syr.html

http://www.bis.doc.gov/policiesandregulations/syriaguidance8_07_09.htm

http://www.treas.gov/offices/enforcement/ofac/programs/syria/syria.shtml

http://www.treas.gov/offices/enforcement/ofac/sdn/index.shtml

NOTE: This paper is intended only as an overview of such regulations affecting exports to Syria administered by the Department of Commerce and the Department of the Treasury. It is not intended as a comprehensive list of legal requirements or restrictions applicable to transactions involving Syria, nor does it relieve persons of their obligation to comply with all applicable laws and regulations.

REVIEW AUTHORITY: Sharon Ahmad, Senior Reviewer